

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: DIISOCYANATES  
ANTITRUST LITIGATION

This document relates to:  
All actions

Master Docket Misc. No. 18-1001

MDL No. 2862

**JOINT PROPOSED AGENDA FOR STATUS CONFERENCE OF NOVEMBER 27, 2018**

Pursuant to the Court's Order of October 30, 2018, the parties will be prepared to address at the November 27, 2018 status conference each of the following issues raised by the Court:

1. Service on all parties of summons and complaints, including the timing of a consolidated amended complaint;
2. Confidentiality and entry of a protective order governing the same;
3. Preservation of evidence;
4. Selection of lead and liaison counsel;
5. A proposed case management order;
6. Scheduling of the Rule 16 conference; and
7. The timing and scope of any appointment of a special master to address pretrial discovery and ESI issues, including plaintiffs' request for the production of any existing government productions, which defendants oppose.

Dated: November 19, 2018

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Respectfully submitted,

/s/ Thomas L. Allen

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*Counsel for BASF Corporation, and for  
purposes of this Joint Proposed Agenda, on  
behalf of Plaintiffs and other served Defendants  
before this Court*